



DELAWARE AUDUBON SOCIETY

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Statement of Delaware Audubon on Delaware's Multi-Pollutant Regulation for Electric Generating Units

April 5, 2006

- **Delaware Audubon supports the implementation of a multi-pollutant regulation as presented by Citizens for Clean Power (CCP).**
- **Similar regulations have been or are being enacted in several adjacent states and elsewhere around the country due in large part to the failure of the federal government to implement an emission reduction program that is protective of public health and the environment.**
- **Contrary to statements made by utility representatives, technology currently exists to achieve the emission reductions levels proposed by CCP.**
- **NRG's Indian River Power Plant and Conectiv's Edge Moor facility are respectively the two largest sources of pollution in the state, with Indian River accounting for almost half of the state's toxic emissions.**
- **Several power companies have shut down units or "repowered" them with cleaner fuels and pollution control technology without the adverse impacts suggested by the utilities.**
- **NRG should immediately shut down the most polluting units, the two 91 MW units (Units #1 and #2) built in the 1950's and the 165 MW unit (Unit #3) built in the 70's. Threats that this would cause black outs or rolling brown outs are disingenuous and totally false. These units were never intended or expected by Congress to operate for 50 years without pollution controls.**

- According to a November 2005 report* prepared by the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO) “(T)echnology to reduce [mercury] emissions from coal-burning power plants by more than 90 percent on many plants is now commercially available, cost-effective, and rapidly advancing.” The utilities should stop misleading the public by suggesting otherwise.
- In the absence of government regulations, plant owners continue to delay long-needed replacement technologies to upgrade their existing facilities post-obsolescence. The truth is industry desires to push capital costs out into the future to maximize earnings. They will not undertake emission reductions without a regulatory mandate.
- Compliance deadlines should be set for as soon as practicable but no later than a 2010 – 2012 timeframe.

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* *“Regulating Mercury from Power Plants: A Model Rule for States and Localities,”* STAPPA/ALAPCO, November 2005.